

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY
RIFLE & PISTOL CLUBS, INC., et
al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

MARK CHEESEMANN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

BLAKE ELLMAN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

Civil Action No. 3:18-cv-10507-PGS-LHG

Civil Action No. 3:22-cv-4360-PGS-
LHG

Civil Action No. 1:22-cv-4397-PGS-
LHG

**DECLARATION OF BLAKE ELLMAN IN SUPPORT OF THE
MOTION FOR SUMMARY JUDGMENT OF ASSOCIATION OF
NEW JERSEY RIFLE & PISTOL CLUBS, INC. (“ANJRPC”)
PLAINTIFFS AND ELLMAN PLAINTIFFS**

1. My name is Blake Ellman. My address is #3 Cristina Court, Chester, New Jersey 07930.

2. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below. I make this Declaration in support of the Motion for Summary Judgment of *ANJRPC* Plaintiffs and *Ellman* Plaintiffs.

3. I am a plaintiff in this matter and a member of ANJRPC.

4. I am a firearms instructor, range safety officer, armorer, and competitive shooter.

5. I am a law-abiding resident and citizen of the United States and the State of New Jersey. I am not a retired law enforcement officer, and I do not fall within any of the other exceptions enumerated in New Jersey's ban on ammunition magazines capable of holding more than 10 rounds of ammunition.

6. Prior to the effective date of Act A2761, I lawfully owned and kept in New Jersey ammunition magazines that qualified as "large capacity ammunition magazines" under the amended law because they were capable of holding more than 10 but fewer than 16 rounds of ammunition. I owned these magazines for lawful purposes, including self-defense in the home. But for the newly enacted ban, I would have continued to own and keep these magazines in my New Jersey home. Instead, I was forced to, in some instances, transfer non-compliant magazines and purchase new replacement magazines at considerable cost and in other instances, spend money to permanently modify other magazines thereby significantly impairing

their value. Further, since the ban went into effect, I have purchased several new pistols for which I was required to pay money to permanently modify the magazines down to 10 rounds prior to receiving them in New Jersey.

7. If it were lawful, I would also acquire new magazines capable of holding more than 10 rounds of ammunition. Because of New Jersey's ban and the associated criminal penalties, I refrain from doing so.

8. I also do not fall within any of the exceptions enumerated in New Jersey's ban on common semi-automatic firearms.

9. I wish to own common semi-automatic firearms for lawful purposes, including self-defense in the home. In particular, I would choose a common semi-automatic rifle as an option for home defense because, as an experienced firearm owner and instructor, I believe that a common semi-automatic rifle is ideally suited to my home defense needs. But for the ban, I would acquire and keep one or more common semi-automatic firearms in his New Jersey home. Because of New Jersey's ban and the associated criminal penalties, I refrain from doing so.

10. I would apply for a license to possess common semi-automatic firearms, but I know that such an attempt would be futile and I would be denied.

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States.



BLAKE ELLMAN

Dated: October 6, 2023